

## **EXHIBIT 31**

Jan-21-03 09:33A Sar el M. Rizzitelli Jr. 2-3-736-9800

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LAW OFFICES  
SAMUEL M.  
RIZZITELLI, JR.

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EXHIBIT

CL 44  
MDF 8-24-05

Samuel M. Rizzitelli, Jr.

January 21, 2003

Via: Facsimile and U.S. Mail

David L. Winn, Warden  
FMC Devens  
P.O. Box 880  
Ayer, Massachusetts 01432  
Facsimile: (978) 796-1118

Cindy Lord, Human Resources Manager  
FMC Devens  
P.O. Box 880  
Ayer, Massachusetts 01432  
Facsimile: (978) 796-1049

RE: Representation of Colleen O'Donnell

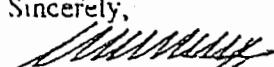
Dear Mr. Winn:

This writing is to advise you that this office has been retained by Colleen O'Donnell. It is also a chance to warn you that your human resource manager is either incapable or unwilling to follow federal labor law. I trust that you will take appropriate action to ensure that Colleen's rights are not violated by Cindy Lord's processing of Colleen's request below.

Dear Cindy:

In response to your January 9, 2003 request for a full medical release from Ms. O'Donnell, I demand that you cease this violation of law and retract that request. Furthermore, you had better not retaliate against her for asserting her rights. At this time, we are requesting that your agency provide Ms. O'Donnell with a reasonable accommodation for post traumatic stress disorder. In lieu of an accommodation, Ms. O'Donnell should be placed on administrative leave or authorized to receive leave from the donated leave bank/pool until she can return to work. Please contact me ASAP in order to resolve this matter with the least amount of litigation possible.

Sincerely,

  
Samuel M. Rizzitelli, Jr., Esq.

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